

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LIZA CURRY,

Plaintiff,

-against-

NEW YORK CITY DEPARTMENT OF EDUCATION
and KYLE BRILLANTE, individually and in his official
capacity as principal of The Highbridge Green School, MS
361

RULE 502(D)
STIPULATION AND
ORDER

19-CV-04450 (KPF)

Defendants.
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WHEREAS, the parties jointly request that this Court issue an order, pursuant to Federal Rule of Evidence 502(d) and the Court's inherent authority, which will allow the parties in this action to conduct and respond to discovery without fear that disclosure of privileged or protected information will automatically waive such privilege or protection in this or any other action or proceeding;

IT IS THEREFORE AGREED BY ANY BETWEEN THE PARTIES AND ORDERED THAT:

1. The production of privileged or work-product protected documents, electronically stored information ("ESI") or information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state action or proceeding. This Stipulation and Order shall be interpreted and provided the maximum protection allowed by Federal Rule of Evidence 502(d).
2. Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness, and/or segregation of privileged and/or protected information before production.

Dated: New York, New York
February 21, 2020

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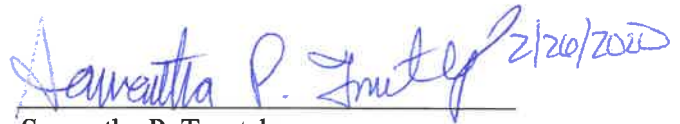


By: _____

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By: _____



Samantha P. Turetsky
Assistant Corporation Counsel

SO ORDERED:

Date

U.S.D.J.